



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

May 23, 2016

Jessica Goldberg
Senior Regulatory Specialist
Chemsico, Division of United Industries
P.O. Box 142642
St. Louis, MO 63114-0642

Subject: PRIA Label Amendment – Addition of marketing claims against fleas
Product Name: CHEMISCO AEROSOL INSECTICIDE BB-LI
EPA Registration Number: 9688-333
Application Date: 04/01/2016
Decision Number: 515859

Dear Ms. Goldberg:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

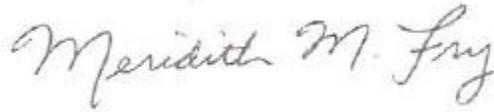
Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance

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with FIFRA section 6. If you have any questions, you may contact Elizabeth Fertich at 703-347-8560 or via email at fertich.elizabeth@epa.gov.

Sincerely,

A handwritten signature in cursive script that reads "Meredith M. Fry". The ink is dark and the signature is centered on the page.

Meridith M. Fry, Ph.D., Product Manager 4
Invertebrate & Vertebrate Branch 1 (IVB1)
Registration Division (7505P)
Office of Pesticide Programs

Enclosure

Chemsico Aerosol Insecticide BB-LI

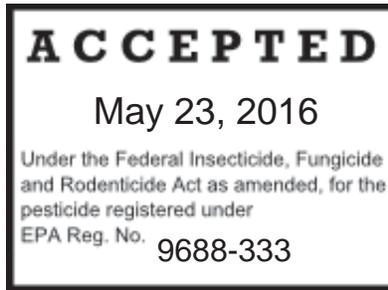
ACTIVE INGREDIENTS:

Imiprothrin	0.100%
Lambda-Cyhalothrin	0.025%
OTHER INGREDIENTS	99.875%
TOTAL:	100.000%

KEEP OUT OF REACH OF CHILDREN

CAUTION See back for additional precautionary statements

NET WT. 12 oz (340 g); 17.5 oz (496g)



STOP! READ ENTIRE LABEL BEFORE USE.**DIRECTIONS FOR USE**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

For indoor residential use only.

HOW TO USE [Option 1]

Shake well before using. [Use straw [extension tube] to apply] spray into cracks and crevices to treat for bed bugs. Spray surfaces until damp, moving the spray rapidly to prevent excessive wetting and waste of product. Application of product should be no less than a three second spray. Point spray away from people, pets and plants. Do not use as a room spray.

Remove pets and cover aquariums before spraying. Do not allow the spray to contact food or food-contacting surfaces. Thoroughly wash dishes, utensils and counter tops with soap and water if they are sprayed with this product.

HOW TO USE [Option 2]

Shake well before using. Hold can at an angle and spray into cracks and crevices to treat for bed bugs. Spray surfaces until damp, moving the spray rapidly to prevent excessive wetting and waste of product. Application of product should be no less than a three second spray. Point spray away from people, pets and plants. Do not use as a room spray.

Remove pets and cover aquariums before spraying. Do not allow the spray to contact food or food-contacting surfaces. Thoroughly wash dishes, utensils and counter tops with soap and water if they are sprayed with this product.

WHERE TO USE [Graphic showing Indoor treatment sites.]

To Kill Bed Bugs and Bed Bug Eggs: Apply as a spot treatment to cracks and crevices [using attached extension tube [straw]], around baseboards, floorboards, bedboards and walls [night stand and dresser drawers][picture frames and wall hangings][crown molding][door and window casings]. Allow treated surfaces to dry thoroughly before use. Inspect area and repeat after 2 weeks [if necessary] while bed bugs are present. For persistent infestations consult a professional applicator.

To Treat Beds for Bed Bugs and Bed Bug Eggs: Disassemble the bed frame and remove bedding. Do not apply product to bedding. Do not saturate the mattress or box spring. Do not treat the entire surface of the mattress or box spring. Apply this product to the bed frame, mattress and box spring [using the attached extension tube [straw]]. Application to mattresses and box springs is intended for treatment of seams, edges and tufts [creases] [folds] [indentations] [buttons] [vent holes] only. Allow the spray to dry before using the mattress and/or box spring. Also apply the product to cracks and crevices in the sleeping area such as baseboards, behind pictures/wall hangings, along and underneath carpet edges and around other articles/furniture in the bedroom or sleeping area. Do not apply to stuffed animals or toys.

To Treat Luggage for Bed Bugs and Bed Bug Eggs: Remove contents and spot treat areas [using the attached extension tube [straw]] that may harbor bed bugs, concentrating on corners, pockets inside the luggage and seams. Allow luggage to dry before reuse.

To Kill Fleas and Ticks: Inspect area to see if fleas or ticks are present. Spray infested areas, such as nearby cracks and crevices, along and behind baseboards, pet resting areas, window and door frames and localized areas of floor coverings. Test inconspicuous sample of fabric or rug for staining before use. Contact fleas and ticks directly with spray. Old bedding of pets should be removed and cleaned or replaced with clean, fresh bedding after treatment of pet area. **Do not treat pets with this product.**

STORAGE AND DISPOSAL

Pesticide Storage: Store in cool, dry area inaccessible to children and away from heat or open flame. Do Not Puncture or Incinerate!

Pesticide Disposal and Container Handling: Nonrefillable container. Do not reuse or refill this container. **If empty:** Place in trash or offer for recycling, if available. **If partly filled:** Call your local solid waste agency for disposal instructions.

Physical or Chemical Hazards

Contents under pressure. Do not use or store near heat or open flame. Do not puncture or incinerate container. Exposure to temperatures above 130° F may cause bursting.

NOTICE: To the extent consistent with applicable law, buyer assumes all responsibility for safety and use not in accordance with directions.

Questions or comments? Call 1-800-332-5553 [or visit our website at www.spectrumbrands.com]

[Contains NO CFC's or other ozone depleting substances. Federal regulations prohibit CFC propellants in aerosols.]

Distributed by Chemsico, Division of United Industries Corporation,
P.O. Box 142642, St. Louis, MO 63114-0642

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EPA Est. No. 9688-MO-1

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List of Optional Marketing Claims

1. Kills bed bugs
2. Kills bed bug eggs [before they hatch]
3. Kills bed bugs [and their eggs] in cracks and crevices
4. Kills bed bugs [and their eggs] in hard to reach [places][spaces]
5. Kills bed bugs [and their eggs] where they hide
6. Also kills ticks and fleas
7. Kills fleas
8. Kills by contact
9. For use on [mattress, box springs, upholstered furniture, luggage, baseboards, floorboards] and carpets to kill bed bugs [and their eggs]
10. [Bed bug] Treatment
11. Inspect area and apply every 2 [two] weeks while bed bugs are present
12. For household use
13. For indoor use
14. Treat the room
15. Effective
16. With bed bug egg kill
17. Water-based [formula]
18. No oily residue
19. Non-staining
20. [Fresh] [Clean] Linen scent
21. No unpleasant odor
22. Easy to use spray
23. *Guaranteed to work [Or your money back]

[*If you are not satisfied with this product for any reason, send your written request for a refund to the address below, together with the dated store receipt showing the price you paid.] [Guaranteed! To work or your money back]. Please allow 6-8 weeks for processing]

Optional Products Facts Box A

Where to Use: Use straw [extension tube] to treat cracks & crevices like the bed frame & box springs
Application: Spray intended use areas until damp (not less than 3 seconds). DO NOT SATURATE.
How Often to Use: Inspect area and apply every two weeks while bed bugs are present.

Optional Products Facts Box B

Where to Use: Treat cracks & crevices like the bed frame & box springs
Application: Spray intended use areas until damp (not less than 3 seconds). DO NOT SATURATE.
How Often to Use: Inspect area and apply every two weeks while bed bugs are present.

(Note to Reviewer: The text on this page will appear on the back label panel of the product)

[Bed Bug Home Protection Plan] [Bed Bug Home Protection Cycle] [Bed Bug 3-Step Process]

[GRAPHICAL ICON identifying the steps: Detection, Treatment, Prevention]



FOR BEST RESULTS USE THIS PRODUCT AS PART OF A COMPREHENSIVE BED BUG TREATMENT PLAN. Visit our website, www.hotshot.com, for more information.

Treating bed bugs as part of a cycle is key to gaining control. Because infestations may be at a different part of the cycle when treatment begins, the information below will help you determine the best place to begin.

DETECTION

If you have not seen any bed bugs or are in prevention mode and want to ensure you are still bed bug free, you want to detect using a combination of the following products:

- **[Hot Shot® Bed Bug] Interceptor**
- **[Hot Shot Bed Bug] Coaster**
- **[Hot Shot® Bed Bug] Glue Traps**

TREATMENT

If you have detected bed bugs by using the products above, being bitten or observing bed bugs, bed bug eggs or excrement in mattress tufts and bedding, you want to choose from one or more of the following product types depending on your needs:

- **Use an aerosol product registered to treat bed bugs [and bed bug eggs] in cracks and crevices.**
- **Use a ready-to-use liquid product registered to treat bed bugs [and bed bug eggs] for spot treatment.**
- **Use a total release fogger registered to treat bed bugs [and bed bug eggs] for areas such as carpet, mattress & box spring surfaces and furniture surfaces.**
- **Use a mattress treatment kit registered to treat bed bugs [and bed bug eggs] for mattresses and other household items.**

PREVENTION

To help prevent the spread of bed bugs from already infested mattresses and box springs into uninfested areas, you want to use an appropriate mattress and box spring encasement.

(Note to Reviewer: The following text is optional language educating the consumer on the steps necessary to approach a bed bug problem. When included in the label, the text in full will be on the product label which will be firmly affixed to the product container).

[Bed Bug Home Protection Plan] [Bed Bug Home Protection Cycle] [Bed Bug 3-Step Process]

Detection

While bites may be the first indicator you have a bed bug problem, bites alone are not proof you have a bed bug problem since bites from ticks, fleas and mosquitoes can resemble bed bug bites. The only way to know for sure is to find and identify the bugs.

Look for:

- Small reddish brown bugs the size of an apple seed. Immature bed bugs can be as small as the head of a pin.
- Small blood stains or dark excreta spots
- Dead bed bugs, shed skins or small whitish eggs
- A sweet or musty odor in the room

A thorough inspection is mandatory. Bed bugs are very good hidiers, so be sure to look in such places as:

- mattresses & box springs – around seams, creases, tufts, buttons, folds, vent holes & indentations
- bed frames – take apart bed frame to inspect cracks and crevices
- bedding & linens
- headboards & footboards
- nightstand & dresser drawers
- storage boxes, including those under beds
- furniture & upholstered furniture cushions
- pull out couches & sofa beds
- curtains & curtain rods
- rugs & tapestries
- cribs & changing tables
- chairs
- luggage & folding luggage racks
- wooden hangers
- clothing
- shoes & shoe boxes
- picture frames & wall hangings
- loose wallpaper or paneling
- wall voids & outlets – behind switchplates
- electrical boxes
- baseboards & floorboards
- carpeting & carpet tack strip
- crown molding
- door & window casings
- files, papers, books & magazines
- smoke detectors, thermostats, alarm clocks, telephones, radios and other electronics
- stuffed animals and plush toys
- pet carriers

Be thorough! Any little crack or crevice can be a bed bug hiding place.

Bed bugs prefer to stay close to their food source (you!) and are typically found within 1-5 feet of sleeping areas and furniture that is frequently occupied.

Detection devices [such as interceptors] [coasters] that are placed anywhere in the room, including under the legs of beds, couches or other furniture, or sticky glue traps can be used to monitor for bed bug activity. You may not notice any bed bug activity for 7-14 days and, even then, monitors will not detect 100% of the time. However, they can provide a barrier between the floor and bed and can be a very useful as part of an integrated pest management program.

Treatment

Bed bugs are challenging to eliminate because they can hide in many different places. Once detected, several steps must be taken to treat properly. Inspections must be thorough and elimination, especially of eggs, is not always a certainty. Treating for bed bugs is not the same as treating for other insects such as roaches and ants. Baits typically used to treat for roaches or ants are ineffective because bed bugs must bite and feed on blood. As a result, multiple treatments and treatment steps over several weeks as part of an integrated pest management program are necessary. Non-chemical and chemical options include:

- **Declutter:** Eliminate all clutter where bed bugs can hide. It is clutter, not uncleanliness, that puts you at risk for a bed bug infestation.
- **Vacuum:** Vacuum the entire area thoroughly, including the underside of the mattress, box spring and furniture, as well as the carpets and floor. Disassemble the bed and vacuum all bed components. Bed bugs and especially their eggs can be difficult to dislodge so use the vacuum's suction wand or crevice tool to scrape the infested area. Immediately discard the vacuum contents into a tightly sealed trash bag. Vacuuming every 2-3 days for 14 days is recommended.
- **Heat Treat:** Dry-wash-dry. First place clothing, bedding, etc. in the dryer for at least 45 minutes at a high temperature (120-140° F). Then, wash and dry all clothing, bedding, etc. at high temperatures (120-140° F). Be careful while stripping the bed so as to not dislodge bed bugs or eggs. Seal in a plastic bag before laundering to avoid spreading bed bugs and again after laundering in a new, clean plastic bag while you finish the treatment process so as to prevent reinfestation. Place toys, shoes, backpacks, etc. in a clothes dryer set at medium to high heat for 10-20 minutes. Wrap items that cannot be put in a washer or dryer in a large plastic bag and place them outdoors in a hot, sunny location or closed vehicle for at least a day. The fewer items packed in each bag, the better. Monitor with a thermometer for a target temperature of at least 120°F. Dry cleaning will have the same effect.
- **Apply Insecticides:** One step in eliminating bed bugs is to carefully apply insecticides registered to treat bed bugs [and bed bug eggs] to all areas where bed bugs are detected. Controlling bed bugs using non-chemical means alone is often very difficult, potentially less effective and usually more time consuming.
 - Carefully read and follow label directions.
 - Allow product to dry completely.
 - Do not sleep directly on treated mattress.
 - We recommend carefully inspecting the area and reapplying insecticides after 2 weeks to kill bed bugs that later hatch from eggs, along with those that were missed during earlier treatment.
- **Cracks & Crevices:** Use an aerosol to treat the cracks and crevices of the bed frame, mattress & box springs, luggage and other hard to reach places, contacting as many of the insects as possible. A dust is best in electrical outlets, wall voids, carpet tack strips and bed frames.
- **Spot Treatment:** Use a liquid insecticide for spot treatment of the mattress, box spring & bed frame, baseboards, carpet & tack strips and luggage, contacting as many insects as possible.
- **Area Treatment:** Use a fogger for larger areas or heavy infestations.
- **Barrier Treatment:** Use a dust to create a barrier around your baseboards, wall voids, electrical outlets and other entrance points.
- **Mattress & Household Items:** To treat the mattress, box spring, furniture and other large household items that cannot be washed, a [household item] [mattress and luggage treatment kit] containing a large sealable plastic bag and bed bug pest strip can be used.
- **Dispose Infested Items:** For items that cannot be treated by vacuuming, heat, laundering or insecticides, tightly wrap and seal in a large plastic bag prior to disposing. Destroy or mark "Infested with Bed Bugs" to prevent someone else from picking them up.

If after one month you are still experiencing a severe bed bug infestation, please contact your local professional pest management company.

Prevention

Proper steps must be taken to prevent an initial or reinfestation. These include:

- **Isolating & Encasing the Bed:** Move your bed and other furniture away from the wall slightly. Remember, bed bugs do not fly or jump! Making sure the bed skirt and blanket do not touch the floor will make it harder for bed bugs to crawl onto the bed. Place detection devices such as interceptors [coasters] or glue traps under or around the bed. Enclose mattress and box spring in encasements to prevent bed bug entry and exit. Do not remove encasements. Use light-colored bedding to help aid in spotting bed bugs.
- **Sealing Cracks & Crevices:** Seal openings in window sills, baseboards, floorboards, furniture, bed frames and where pipes or wires or other utilities enter the home. Fix or take down any peeling wall paper. Tighten loose switch covers. Installing door sweeps will help discourage movement into hallways. For extra protection, dust can be puffed into all cracks and crevices that are difficult to reach or can't be sealed such as electrical outlets, wall voids, carpet tack strips and bed frames. As long as the dust is present, it will remain effective and keep killing bed bugs. Be sure to carefully read and follow label directions .
- **Manage the Environment:** Eliminate clutter. Launder bedding and clean furniture routinely. Vacuum often and thoroughly. Thoroughly inspect purchased furniture before bringing it home, especially if it was purchased used. Avoid purchasing used furniture. Monitor previously infested or likely to be infested sites daily. Remove evidence of previous infestations. Restart treatment process if necessary.

Bed bugs are typically transported from place to place as people travel, so it is important to take proper precautionary steps when traveling. Also make sure any visiting guests are not transporting bed bugs in their luggage.

- **Prior to Travel:**

- DO Spray luggage and allow to dry completely with a product registered to treat bed bugs [and bed bug eggs] and for use on luggage.
- DO Pack clothing and other items in sealable plastic bags. Bring extra resealable plastic bags for soiled clothing.
- **At Hotel/Destination:**
 - DO check for signs of bed bugs by examining the cracks and crevices of the mattress, box spring, sheets, bedding, headboard, nightstand & dresser drawers, desks, chairs, and other furniture; behind wallpaper and pictures; in clocks and other electronics; in cracks in wood floors; and under the edge of the carpet. Carrying a small flashlight such as the [insert product name here] will help you quickly and thoroughly inspect for signs.
 - DO change rooms immediately, or change hotels entirely, if you identify bed bugs in your hotel room.
 - DO NOT put your suitcase on the bed. Elevate all luggage off the floor using a luggage rack (inspect first), tabletop or other hard surface. The best place is in the bathroom, especially the tub.
 - DO NOT unpack your suitcase contents into dressers.
 - DO check clothes hangers thoroughly before unpacking. Bed bugs hide in the cracks and crevices of hangers so a thorough inspection is necessary before hanging up clothes, especially if the hangers are wooden.
 - DO re-pack luggage contents into sealable plastic bags so you can throw them directly in the dryer when you return home to kill any bed bugs or eggs that may be nestled in the clothing.
- **Returning Home:**
 - DO NOT unpack luggage inside. Unpack luggage outside, or in a garage, laundry room or utility room.
 - DO remove the items you placed in plastic bags at the hotel, and throw them immediately into the dryer, set on the highest heat setting the fabric can withstand to kill any bed bugs or their offspring that may be nestled in the items.
 - DO inspect luggage and clothing for signs of bed bug activity. If signs are found, treat luggage by vacuuming, laundering (scrubbing with hot, soapy water) and/or insecticides.
 - DO store luggage in sealed bags and keep them in a closet or garage. If you are exposed to a bed bug infestation, there is no reason to throw out your luggage and clothing unless your infestation is severe. The key is to contain all items suspected of carrying bed bugs in plastic bags until you can treat them.

These steps are very important, and must be done carefully, consistently and cyclically. Bed bugs are resilient creatures that will not go away without intervention.

A comprehensive, continuous cycle of Detection → Treatment → Prevention is the key to gaining control.